

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS


In the Matter of The Empire District Electric )  
Company Filing Compliance Reports and )  
Information as Prescribed by Commission Order )  
Dated July 9, 2020, in Docket No. )  
20-EPDE-427-ACT )

Docket No. 21-EPDE-072-CPL

**COMPLIANCE FILING**

The Empire District Electric Company ("Liberty-Empire"), pursuant to the requirements of the Commission's Order issued in Docket No. 20-EPDE-427-ACT ("427 Docket") on July 9, 2020, is providing the attached information.

WHEREFORE, Liberty-Empire requests the information provided be accepted by the Commission in compliance with the reporting requirements in the 427 Docket.



James G. Flaherty, #11177

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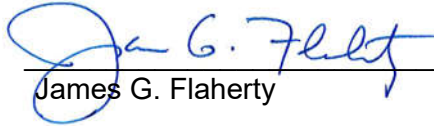
Attorneys for The Empire District Electric Company

## VERIFICATION

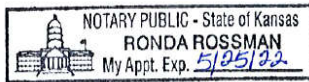
STATE OF KANSAS  
COUNTY OF FRANKLIN, ss:

James G. Flaherty, of lawful age, being first duly sworn on oath, states:

That he is the attorney for The Empire District Electric Company named in the foregoing Compliance Filing and is duly authorized to make this affidavit; that he has read the foregoing and knows the contents thereof; and that the facts set forth therein are true and correct.

  
James G. Flaherty

SUBSCRIBED AND SWORN to before me this 26<sup>th</sup> day of March, 2021.



  
Notary Public

Appointment/Commission Expires:

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing was sent via electronic mail this 26<sup>th</sup> day of March, 2021, addressed to:

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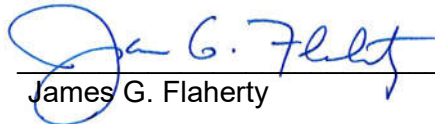
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James G. Flaherty

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

Semi-annual filing - September 2020 - February 2021

Paragraph 2

a. A detailed identification of all COVID-19 related cost increases and decreases that Empire-Liberty has tracked to date. These costs should be separated and reported by detailed cost category and by month;

	September 2020	October 2020	November 2020	December 2020	January 2021	February 2021
Revenue Impact	\$ (6,583)	\$ (33,131)	\$ 14,780	\$ (33,242)	\$ -	\$ -
Increased Costs						
Cost Category						
Late Payment Fees	\$ 33,160	\$ 31,279	\$ 22,075	\$ 35,584	\$ 36,040	\$ 37,008
Uncollectibles/Bad Debt	\$ (63,872)	\$ 25,481	\$ (2,694)	\$ (9,628)	\$ (3,292)	\$ 1,555
IT Costs / Remote Work	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
WiFi Expenses	\$ 213	\$ 91	\$ 75	\$ 68	\$ 63	\$ 68
Supply Chain/Cleaning/PPE	\$ 1,035	\$ 694	\$ 857	\$ 3	\$ 2,976	\$ 3
Communication	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Legal Fees - under analysis	\$ -	\$ -	\$ -	\$ -	\$ 829	\$ 379
Meals	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Decreased Costs						
Cost Category						
Training & Travel	\$ 1,352	\$ 1,082	\$ 1,396	\$ 1,065	\$ 838	\$ 1,850
Utilities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Labor						
Incremental Only for Recovery	\$ 476	\$ 480	\$ 256	\$ 228	\$ 370	\$ 146

Liberty Utilities - Empire Electric

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b. A detailed identification of revenue changes by customer class, both increases and decreases, during the COVID-19 pandemic;

		September 2020	October 2020	November 2020	December 2020	January 2021	February 2021.
Residential	NM-Net Metering	\$ (42)	\$ (83)	\$ (92)	\$ (22)	\$ (16)	\$ -
	PL-Private Lighting	\$ 16,950	\$ 17,169	\$ 17,402	\$ 16,693	\$ 17,300	\$ 17,656
	RG-Residential	\$ 703,219	\$ 467,836	\$ 540,556	\$ 602,575	\$ 800,473	\$ 774,726
	RG-Residential Water Heat	\$ 104,699	\$ 85,191	\$ 81,360	\$ 92,175	\$ 139,567	\$ 120,698
	RH-Residential Total Elec	\$ 243,831	\$ 205,730	\$ 261,004	\$ 336,021	\$ 468,137	\$ 520,249
Residential Total		\$ 1,068,658	\$ 775,842	\$ 900,230	\$ 1,047,442	\$ 1,425,461	\$ 1,433,329
Commercial	CB-Commercial	\$ 219,729	\$ (467,724)	\$ 798,387	\$ 179,219	\$ 239,038	\$ 185,651
	GP-General Power	\$ 210,987	\$ 839,427	\$ (457,151)	\$ 194,903	\$ 195,176	\$ 186,770
	LS-Special Lighting	\$ 449	\$ 861	\$ 740	\$ 437	\$ 426	\$ 425
	NM-Net Metering	\$ (158)	\$ (79)	\$ (49)	\$ -	\$ -	\$ (42)
	PL-Private Lighting	\$ 14,758	\$ 15,090	\$ 15,327	\$ 15,069	\$ 15,044	\$ 15,258
	SH-Small Heating	\$ 20,995	\$ 16,907	\$ 17,604	\$ 25,198	\$ 32,612	\$ 35,238
	TEB-Total Electric Bldg	\$ 60,152	\$ 57,179	\$ 57,092	\$ 71,389	\$ 91,122	\$ 98,744
Commercial Total		\$ 526,912	\$ 461,661	\$ 431,951	\$ 486,214	\$ 573,419	\$ 522,043
Industrial	CB-Commercial	\$ 2,668	\$ 1,471	\$ 1,795	\$ 2,496	\$ 2,780	\$ 2,813
	GP-General Power	\$ 118,243	\$ 120,738	\$ 120,992	\$ 124,803	\$ 133,304	\$ 136,850
	PL-Private Lighting	\$ 3,098	\$ 3,131	\$ 3,204	\$ 3,253	\$ 2,865	\$ 2,880
	PT-Transmission	\$ 295,576	\$ 272,464	\$ 282,201	\$ 297,369	\$ 269,138	\$ 313,340
	SH-Small Heating	\$ 52	\$ 497	\$ 869	\$ 1,344	\$ 1,223	\$ 1,065
	TEB-Total Electric Bldg	\$ 1,387	\$ 1,382	\$ 1,607	\$ 1,648	\$ 1,231	\$ 1,649
Industrial Total		\$ 421,024	\$ 399,682	\$ 410,668	\$ 430,913	\$ 410,540	\$ 458,597
Muni Street & Highway Lighting	CB-Commercial	\$ 2,386	\$ 2,357	\$ 2,355	\$ 2,683	\$ 2,790	\$ 2,796
	LS-Special Lighting	\$ 677	\$ 115	\$ 260	\$ 187	\$ 184	\$ 129
	PL-Private Lighting	\$ 186	\$ 189	\$ 193	\$ 193	\$ 192	\$ 194
	SPL-Municipal St Lighting	\$ 16,668	\$ 16,449	\$ 17,383	\$ 18,506	\$ 18,551	\$ 18,365
Muni Street & Highway Lighting Total		\$ 19,917	\$ 19,109	\$ 20,191	\$ 21,569	\$ 21,717	\$ 21,484
Other Public Authority	CB-Commercial	\$ 14,274	\$ 12,485	\$ 23,574	\$ (504)	\$ 14,889	\$ 13,909
	GP-General Power	\$ 24,789	\$ 24,168	\$ 27,598	\$ 27,568	\$ 31,715	\$ 29,266
	LS-Special Lighting	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	PL-Private Lighting	\$ 42	\$ 43	\$ 44	\$ 44	\$ 44	\$ 44
	SH-Small Heating	\$ 1,066	\$ 683	\$ 1,132	\$ 1,756	\$ 2,628	\$ 2,598
	TEB-Total Electric Bldg	\$ 1,486	\$ 1,222	\$ 1,029	\$ 1,262	\$ 1,681	\$ 1,452
Other Public Authority Total		\$ 41,657	\$ 38,602	\$ 53,376	\$ 30,126	\$ 50,956	\$ 47,268
Grand Total		\$ 2,078,168	\$ 1,694,895	\$ 1,816,416	\$ 2,016,265	\$ 2,482,093	\$ 2,482,721

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

Semi-annual filing - September 2020 - February 2021

Paragraph 2

c. The impact COVID-19 has had on the Empire-Liberty's capital expenditure program during the previous semi annual period

COVID-19 has not impacted Empire-Liberty's capital expenditure program during the period.

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

Semi-annual filing - March 2020 - August 2020

Paragraph 2

**Redacted**

d. Any issuances of short-term and long-term debt during the previous semi-annual period and the all-in costs at which that financing was issued;

**CONTAINS CONFIDENTIAL  
INFORMATION  
NOT AVAILABLE TO THE PUBLIC.  
ORIGINALS FILED UNDER SEAL**

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

**Redacted**

Semi-annual filing - September 2020 - February 2021

Paragraph 2

e. The embedded cost of short-term debt for the semi-annual period.

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Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

**Redacted**

Semi-annual filing - September 2020 - February 2021

Paragraph 2

f. Updated and most recent credit metrics calculated by Empire-Liberty or provided to the company by nationally recognized credit rating agencies;

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INFORMATION  
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# Attachment A Redacted

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

g. Any correspondence with nationally recognized credit rating agencies and equity analysts during the semi-annual period

Attachment A Email received from Moodys

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## Attachment B

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

g. Any correspondence with nationally recognized credit rating agencies and equity analysts during the semi-annual period

Attachment B Email received from S and P

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# Attachment C Redacted

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

g. Any correspondence with nationally recognized credit rating agencies and equity analysts during the semi-annual period

Attachment C Email Sent to Moodys

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# Attachment D



Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

g. Any correspondence with nationally recognized credit rating agencies and equity analysts during the semi-annual period

Attachment D Email Sent to S and P

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# Attachment D

Liberty Utilities - Empire Electric

Docket No. 20-EPDE-427-ACT

h. Copies of credit rating agencies and equity analysts' reports published during the previous semi-annual period.

Attachment E Credit Ratings

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